UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

KBC INVESTMENTS LIMITED,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 11-02761 (SMB)

STIPULATION EXTENDING TIME TO RESPOND AND ADJOURNING THE PRE-TRIAL CONFERENCE

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which defendant KBC Investments Limited ("Defendant") may answer, move against, or otherwise respond to the Trustee's complaint ("Complaint") is extended up to and including June 30, 2014. The pre-trial conference will be adjourned from July 30, 2014, at 10:00 a.m. to August 27, 2014, at 10:00 a.m.

The purpose of this stipulated extension ("Stipulation") is to provide additional time for the Defendant to answer, move against, or otherwise respond to the Complaint. Nothing in this 08-01789-cgm Doc 6673 Filed 05/15/14 Entered 05/15/14 14:42:21 Main Document Pq 2 of 3

Stipulation is a waiver of the Defendant's right to request from the Court a further extension of

time to answer, move against, or otherwise respond to the Complaint and/or the Trustee's right to

object to any such request.

The parties to this Stipulation reserve all other rights and defenses they may have, and

entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including

without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of

which when so signed shall be an original, but all of which shall together constitute one and the

same instrument. A signed facsimile, photocopy, or electronic copy of this Stipulation shall be

deemed an original. This Stipulation is entered into pursuant to the Order Granting

Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial

Conferences (Adv. Pro. No. 08-01789 (SMB), Dkt. No. 5600).

Dated: May 15, 2014

New York, New York

/s/ Thomas L. Long

BAKER & HOSTETLER LLP

45 Rockefeller Plaza

New York, New York 10111

Telephone: (212) 589-4200

Facsimile: (212) 589-4201

David J. Sheehan

Email: dsheehan@bakerlaw.com

Thomas L. Long

Email: tlong@bakerlaw.com

Mark A. Kornfeld

Email: mkornfeld@bakerlaw.com

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities

LLC and the Estate of Bernard L. Madoff

2

/s/ Alan M. Unger SIDLEY AUSTIN LLP

787 Seventh Avenue New York, New York 10019 Telephone: (212) 839-5785 Facsimile: (212) 839-5599

Alan M. Unger

Email: aunger@sidley.com

Attorneys for KBC Investments Limited